



L. Barbee Ponder IV

General Counsel & Vice President Regulatory Affairs

October 17, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: MD Docket No. 12-201

Dear Ms. Dortch:

Globalstar, Inc. ("Globalstar") hereby replies briefly to comments on the Federal Communications Commission's ("Commission's") Notice of Proposed Rulemaking in the above-captioned proceeding on the procedures for assessment and collection of regulatory fees.¹

Globalstar, a leading global provider of mobile satellite service ("MSS") in the Big LEO band, appreciates the Commission's effort to reform and update its regulatory fee framework. At the same time, Globalstar agrees with the Satellite Industry Association ("SIA") that, in enacting such reform, the Commission must make certain that its regulatory fee assessments conform to the statutory mandate that the costs of its regulatory activities be fairly apportioned among licensees regulated by the agency.² Like SIA, Globalstar is concerned that the specific revisions described in the NPRM could result in a significant and unjustified increase in the fees paid by satellite operators, contrary to Congress' regulatory fee mandate.³

As SIA points out, the continued streamlining of satellite regulation has reduced the proportion of the International Bureau's costs that are attributable to satellite licensees.⁴ Under the FCC's primary regulatory fee proposal, however, satellite operators would not benefit from this decreased regulatory burden as

¹ *Procedures for Assessment and Collection of Regulatory Fees*, Notice of Proposed Rulemaking, 27 FCC Rcd 8390 (2012).

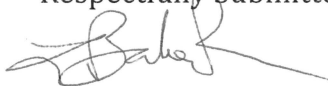
² See 47 U.S.C. § 159(a)(1); Comments of the Satellite Industry Association, MD Docket No. 12-201, 1-2 (Sep. 17, 2012).

³ SIA Comments at 1-2.

⁴ *Id.* at 12-16.

required by the statute.⁵ Rather, under the Commission's proposed allocation of all costs of the "core licensing bureaus" as direct costs for fee payers regulated by those bureaus, satellite licensees would be subject to costs for International Bureau personnel who have *no* direct satellite-specific responsibilities. Globalstar joins SIA in urging the Commission to revise this proposed methodology and take the actions necessary to ensure that the regulatory fees for satellite licensees reasonably correspond to the underlying costs of regulating the satellite industry.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L. Barbee Ponder IV", written over a horizontal line.

L. Barbee Ponder IV
General Counsel & Vice President Regulatory Affairs

⁵ 47 U.S.C. § 159(b)(1) (requiring that regulatory fees be "adjusted to take into account factors that are reasonably related to the benefits provided to the payor of the fee by the Commission's activities").